

### **REMARKS**

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed on October 16, 2008. Claims 1-7 and 21-32 are pending. Claims 1-6 and 21-32 are rejected. Claim 7 is objected to. In this Amendment, claims 1, 4, 21-23, and 27-29 have been amended. The amendments to the claims are supported in at least paragraphs 29, 30, and 38 of the specification as originally filed. No new matter has been added. No claims have been canceled. Therefore, claims 1-7 and 21-32 are presented for examination.

### **Examiner Interview**

Applicant thanks the Examiner for the courtesy of the telephone interview on January 9, 2009 in which possible amendments to the independent claims were discussed. No particular agreement was reached.

### **Objections to the Specification**

The Examiner has objected to the disclosure because of the following informalities: “recordable type media” in page 18, line 10 of the original specification should be changed to “storage type media” to be consistent with claims 27-32. Paragraph 43 of the specification as originally filed has been amended in accordance with the Examiner’s suggestion.

### **Rejections Under 35 U.S.C. § 112**

#### **Claims 1 and 4**

The Examiner has rejected claims 1 and 4 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 1 and 4 have been amended to recite “the plurality of upper-level addresses”. Applicant submits that the amendments to claims 1 and 4 overcome the rejections under 35 U.S.C. § 112, second paragraph and respectfully requests withdrawal of the rejection.

### Rejections Under 35 U.S.C. § 103

#### Claims 1-6

The Examiner has rejected claims 1-6 under 35 U.S.C. § 103(a) as being unpatentable over Latif et al., (U.S. Patent Publication No. 2003/0091037, hereinafter “Latif”), in view of Woodring, (U.S. Patent Publication No. 2002/0191649, hereinafter “Woodring”), and further in view of Cranor et al., (U.S. Patent Publication No. 2003/0093523, hereinafter “Cranor”).

Latif discloses a storage system having both Internet Protocol (IP) and Fibre Channel (FC) address domains. Latif further discloses switches that provide translation between the IP and FC addresses, where the IP and FC addresses are stored in tables in the switches.

Woodring discloses a storage area network including a monitoring component for characterizing data flowing into or out of a Fibre Channel port.

Cranor discloses a system for building associations between clients and domain name servers used by the clients. The system of Cranor embeds the network address of a client in a calibrating domain name, and utilizes the calibrating domain name to identify the client to a DNS server.

Claim 1, as amended, recites encoding a plurality of upper-level addresses within a symbolic name of an FC node device, where the plurality of upper-level addresses includes a backup address associated with a second FC node device.

The Office Action admits that Latif and Woodring fail to teach or suggest encoding an upper-level address within a symbolic name of an FC node device. Accordingly, Latif and Woodring further fail to teach or suggest encoding a plurality of upper-level addresses in the symbolic name, much less that the plurality of upper-level addresses encoded in the symbolic name includes a backup address associated with a second FC node device, as recited in claim 1.

Cranor also fails to teach or suggest that a plurality of upper-level addresses encoded in the symbolic name of an FC node device includes a backup address associated with a second FC node device. The Office Action appears to consider the upper-level address and the symbolic name, as recited in claim 1, as equivalent to the client network address and the calibrating domain name of Cranor, respectively. However, even assuming *arguendo* that these can be considered equivalent, Cranor still does not teach or suggest that the calibrating domain name

can encode a plurality of addresses, much less that the plurality of addresses includes a backup address associated with a second FC node device.

None of Latif, Woodring, and Cranor teaches or suggests encoding a plurality of upper-level addresses within a symbolic name of an FC node device, wherein the plurality of upper-level addresses includes a backup address associated with a second FC node device. Therefore, the combination of Latif, Woodring, and Cranor cannot be properly interpreted as disclosing the claimed element, and does not render obvious claim 1, as amended. Dependent claims 2-6 are also not rendered obvious by the combination. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-6 under 35 U.S.C. § 103(a) over the combination.

#### Claims 21-22 and 27-28

The Examiner has rejected claims 21-22 and 27-28 under 35 U.S.C. § 103(a) as being unpatentable over Latif in view of Woodring.

Claims 21 and 27 recite a similar element as claim 1 of storing a plurality of IP addresses as a symbolic name within a symbolic name field for a FC N\_Port, wherein the plurality of IP addresses includes a backup address associated with a second FC N\_Port. Neither Latif nor Woodring teach or suggest this element, as discussed above with respect to claim 1. Therefore, the combination of Latif and Woodring cannot be properly interpreted as disclosing the claimed element, and the combination does not render obvious the invention as claimed in claims 21 and 27. Dependent claims 22 and 28 are also not rendered obvious by the combination. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 21-22 and 27-28 under 35 U.S.C. § 103(a) over the combination.

#### Claims 23-26 and 29-32

The Examiner has rejected claims 23-26 and 29-32 under 35 U.S.C. § 103(a) as being unpatentable over Latif, Woodring, and further in view of Bessire, (U.S. Patent No. 7,055,056, hereinafter “Bessire”). Bessire qualifies as prior art only under 35 U.S.C. § 102(e) because it issued after Applicant's effective filing date. Applicant does not admit that Bessire is prior art and reserves the right to challenge the reference at a later date.

Bessire discloses a storage system where a controller in the system can assume control of the network address of a failed controller to ensure availability of the storage system. The system of Bessire stores the address of a second iSCSI controller, to be assumed by a first iSCSI controller, in the memory of the first iSCSI controller.

Claims 23-26 and 29-32 depend from one of independent claims 21 and 27. Claims 21 and 27, as amended, recite storing a plurality of IP addresses as a symbolic name within a symbolic name field for a FC N\_Port, wherein the plurality of IP addresses includes a backup address associated with a second FC N\_Port. Even assuming *arguendo* that the network address of the second iSCSI controller of Bessire can be considered as reading on the backup address as recited in claims 21 and 27, Bessire only discloses that the address is stored in memory of the first iSCSI controller. Bessire still fails to teach or suggest that the address is one of a plurality of IP addresses stored as a symbolic name within a symbolic name field for a FC N\_Port.

#### **Allowable Subject Matter**

The Examiner has objected to claim 7 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In view of the above amendments and remarks, Applicant submits that claim 7 now depends from an allowable base claim, and therefore declines to amend claim 7 at this time.

### **SUMMARY**

Claims 1-7 and 21-32 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Kerry Liang at (408) 720-8300.

### **Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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